

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
John P. McDonough	:	Case No. 23-10355-JCM
Carolyn C. McDonough	:	Chapter 13
Debtor(s)	:	
	:	
Pennymac Loan Services, LLC, its	:	Related to Document #25
successors and/or assigns	:	
Movant(s)	:	
	:	
vs.	:	Hearing: 10/17/23 at 1:30 p.m.
John P. McDonough, Carolyn C.	:	
McDonough and Ronda J. Winnecour,	:	
Trustee	:	
Respondents	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. PennyMac Loan Services, LLC, its successors and/or assigns, requests relief from stay with regard to property located at 923 Long Point Drive, Erie, PA 16505.
2. Debtors' Schedules reflect that the fair market value of the property is \$346,500 and Debtors have claimed an exemption in that property in the amount of \$41,756.
3. Movant is the sole lienholder against the property with a claim in the amount of \$304,744.
4. An order confirming a plan was entered on August 10, 2023 (Docket No. 22).
5. Trustee disbursed a payment to Movant in the amount of \$3858.81 on September 26, 2023.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: September 25, 2023

By: /s/ James C. Warmbrodt  
James C. Warmbrodt, PA I.D. 42524  
Attorney for Chapter 13 Trustee  
US Steel Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
[jwarmbrodt@chapter13trusteedpa.com](mailto:jwarmbrodt@chapter13trusteedpa.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:  
John P. McDonough : Case No. 23-10355-JCM  
Carolyn C. McDonough : Chapter 13  
Debtor(s) :  
:  
Pennymac Loan Services, LLC, its : Related to Document #25  
successors and/or assigns :  
Movant(s) :  
:  
vs. : Hearing: 10/17/23 at 1:30 p.m.  
John P. McDonough, Carolyn C. :  
McDonough and Ronda J. Winnecour, :  
Trustee :  
Respondents :

CERTIFICATE OF SERVICE

I hereby certify that on the 26<sup>th</sup> of September 2023, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Marta E. Villacorta, Esquire  
Office of the United States Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222-3721

John and Carolyn McDonough  
923 Long Point Drive  
Erie, PA 16505

Rebeka Seelinger, Esquire  
4640 Wolf Road  
Erie, PA 16505

Brian Nicholas, Esquire  
701 Market Street, Suite 5000  
Philadelphia, PA 19106

/s/Rosa Richard  
Office of Chapter 13 Trustee  
U.S. Steel Tower – Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
cmecf@chapter13trusteedpa.com